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January 15, 2025

Via ECF

Judge Edward S. Kiel
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *J.G. v. Jones*
United States District Court, District of New Jersey
Civ No. 24-cv-08232

Dear Judge Kiel,

Our office represents the plaintiff, J.G. I write this letter to request the ability to conduct limited third-party discovery pursuant to Fed. R. Civ. P. 26(d)(1). On January 15, 2025, the court issued an order granting plaintiff's motion for default judgment and set the matter down for an inquest on February 19, 2025 (DE 12). At the inquest, we intend to request a significant award of punitive damages pursuant to 15 U.S.C. § 6851(b)(3)(A)(i) and N.J.S.A. 2A:58D-1. In order to assist the court in an award of damages, and to further demonstrate defendant's culpability, it is respectfully requested that good cause exists to obtain third party discovery. *Times Three Clothier, LLC v. Rack's Offprice, Civil Action No. 22-3013 (KM) (MAH), 2022 U.S. Dist. LEXIS 137742, at *10 (D.N.J. Aug. 3, 2022)*. It is therefore respectfully requested that plaintiff be able to serve third party subpoenas on the following companies:

1. **Verizon** for account information regarding the IP address 71.162.241.154 used to upload Plaintiff's images, including billing information to help determine defendant's financial standing.
2. **Hivemind Construction**, defendant's place of employment.
3. **AT&T**, defendant's phone provider, for billing records.
4. **Venmo**, for defendant's financial information.
5. **Well Fargo**, one of the defendant's financial institutions.
6. **Google LLC**, for the email address grocermcgill@gmail.com.

Leave is also requested to subpoena any additional financial institutions or third parties that Plaintiff learns about in response to the aforementioned subpoenas.

Thank you very much in advance.

Respectfully submitted,

/s/*Daniel Szalkiewicz*
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